

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

SOCIETE DES BAINS DE MER ET DU
CERCLE DES ETRANGERS A MONACO,

Plaintiff,
vs.
MGM MIRAGE and VICTORIA PARTNERS,
L.P.,
Defendants.

ECF Case

Case No. 08-CV-03157

DECLARATION OF SHELANE DANIELS

I, Shelane Daniels, declare under penalty of perjury under the laws of the United States, as follows:

1. I am the Financial Controller for Victoria Partners dba Monte Carlo Resort & Casino in Las Vegas, Nevada. I have personal knowledge of the following facts based upon my review of business records of Victoria Partners kept in the ordinary course of its business.
2. According to Victoria Partners' general ledger, the company incurred the following advertising expenses on an annual basis from 1996 to the present:

1996	\$3,795,215
1997	\$6,729,029
1998	\$7,436,500
1999	\$8,177,748
2000	\$8,397,621
2001	\$7,225,599
2002	\$6,773,104
2003	\$5,696,820
2004	\$6,460,058
2005	\$5,935,724
2006	\$5,653,037
2007	\$5,606,162
2008	<u>\$2,620,731</u>
	<u>\$80,507,348</u>

These expenses include advertising for: (1) the property; and (2) entertainment events at the

property.

3. In addition to the advertising expenses, Victoria Partners' records indicate that it has incurred marketing expenses. These expenses require more research to quantify, because the costs are incurred by different operations of the property. However, as examples of the magnitude of such expenses, based on my review of company records, I estimate that the marketing expenses incurred were approximately \$648,445 and \$751,583, for 2006 and 2007, respectively, and \$211,426 for the first two quarters of 2008.

Dated this 21st day of July, 2008

Shelane Daniels
Shelane Daniels

CERTIFICATE OF SERVICE

I hereby certify that on the 21st day of July, 2008, I served a copy of this **DECLARATION OF SHELANE DANIELS** on the attorneys for the Plaintiff, as designated below, by ECF Filing as follows:

Robert L. Raskopf
Claudia T. Bogdanos
Jonathan Scharf
QUINN EMANUEL URQUHART OLIVER & HEDGES, LLP
51 Madison Avenue, 22nd Floor
New York, NY 10010

/s E. Michelle Dean
E. Michelle Dean
WHITE & CASE LLP
1155 Avenue of the Americas
New York, New York 10036